

EXHIBIT 22

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From: Nathan Wolfe on behalf of Nathan Wolfe <ndwolfe@stanford.edu>
To: Gal Cohen
CC: Riaz Valani; Zach Frankel; Nicholas J. Pritzker; [REDACTED] Adam Bowen; Blair LaCorte; Hank Handelsman
Sent: 11/30/2014 10:32:52 AM
Subject: Re: E-Cigarettes Contain '10 Times More Carcinogens Than Regular Tobacco'

Valani Exhibit

40081

9/30/21 Carrie Campbell, #13921

Hey folks

Interesting dialogue! I've provided a few specific suggestions (below) and some general thoughts (far below)

Specific suggestions:

- 1) Now: I think it would be useful to have Susan try to get a sense of what specifically Richtel is writing about and what he believes the biggest concerns are. This may help determine whether it makes sense to reach out to him, and if so how
- 2) Short term: I think finding a unique Ploom media approach for engaging in discourse on health concerns is worthwhile. One approach for Ploom, that for me became clarified in a meeting a few weeks ago with James and Sarah, and that I think highly worthy for consideration, is to focus on an *innovator angle* to these issues. Something like: "it's not our job to debate health and regulation issues, it's our job to innovate, and the one thing everyone can agree on is that new solutions are essential". It permits us to be a part of the debate on terms that are both appropriate and unique for us, and permits a "that's for someone else to comment on" response for parts of the debate we shouldn't engage in. The idea is cars are dangerous but they're not going away, and without innovators we wouldn't have seat belts or air bags and it's in everyone's interest to let those innovators do their jobs.
- 3) Medium term: this may be something already in place at Ploom, and it's not my expertise, but it seems useful to have a set of corporate objectives for how regulation, standards, QA/QC etc should work out. I'm not suggesting we try to lead the industry on any of this, which seems like a huge time sink and likely thankless task, but at least to know what we believe is best. For example, if there are specific regulatory avenues, standards, or independent-party testing approaches etc that we believe are simultaneously best for Ploom and best for humanity it would be good to know what those are as we could highlight them in media outreach and perhaps consider other specific strategies for pushing adoption.

General thoughts:

I think it's useful to distinguish between different kinds of concerns. In my mind the two main concerns are the *relative harm* concern in relationship to chronic diseases, particularly cancer (i.e. e-cigs vs cigs) and the second is the *addiction concern* (particularly in relationship to kids). These issues are quite different.

The *relative harm* issue is a 'better of evils' kind of discussion, that I believe a fairly simple one. The thought experiment is: snap your fingers and everyone in the world who is smoking cigarettes now is smoking e-cigs. Any informed person who would not choose this utopia is a liar or idiot, so while more apples-to-apples research can help here and the setting of standards with independent party QA/QC/ratings would presumably be of use, I think the solution in this case is mostly education for the public and at times the media. The Farsalinas article that Gal sent is excellent in this sense.

The addiction issue is I believe a more difficult one. In a world where addictive nicotine-based products are legal and widely available you would imagine that the public would welcome new solutions. However, no matter how bad, the public has become habituated to cigarettes, so new things feel scary (think Ebola vs. Influenza) and the press takes advantage of that. In the case of the *relative harm* issue this is basically an illogical fear on the part of the public. The addiction issue I believe is less clear cut. While addictive, society has more or less adapted to marketing, availability etc with cigarettes, so whatever the harm, we know it is basically stable. Here the comparison is more between

malaria and Ebola. While, malaria will kill over 500,000 people this year and Ebola less than 10,000, the rate of increase does make Ebola worthy of concern. In this context the use by unethical companies of bubble gum flavored e-cigs and the lack of clarity on regulation provides a more legitimate concern, and one that requires a more sophisticated response by the industry.

While as mentioned above I don't believe trying to lead the industry on making a risk reduction argument or arguing for particular regulation is necessarily in our interest, I DO think that developing some angles of supporting the broader effort are worthwhile. Innovation as mentioned earlier would be an obvious one. Another example, is the 'anti-smoke' angle - for example, the snus evidence that using 'air' to cure rather than 'smoke' fits our broader philosophy in the space. More minor related point: depending on the direction we take, engaging with the right scientific supporters could make sense - and to that point I have good connections in epidemiology at Stanford so happy to find a connection to Kristin Sainani (who was mentioned in the nytimes snus article and seems rational) or even have an independent discussion with her to get her take on landscape if useful.

Best
Nathan

On Sat, Nov 29, 2014 at 6:20 AM, Gal Cohen <gal@ploom.com> wrote:
Riaz,

From an SRA perspective we are moving very aggressively and I think effectively to position the company as a leader for social responsibility.

We already have the best regarded and most influential thought leaders in the country, Scott Ballin, and Dave Sweanor working as very strong allies.

We will be forming a social responsibility advisory board, which will be featured prominently in key events when appropriate. I feel very positively about how things are going. I would be happy to provide some kind of briefing materials for James to include in the next BOD meeting.

I'm not going to speak to the mainstream press strategy because it's not my turf, and I respect the organizational discipline that James and Danna are working hard to instill into our corporate culture. That said Sarah and I are working very closely and effectively together.

Regards

Gal

On Sat, Nov 29, 2014 at 4:51 AM, Riaz Valani <RValani@gacapital.com> wrote:
I think it is a very important thing to figure out.

Gal/Nathan/James,

What do you think we should be doing to defining our strategy here?

Sent from my iPhone

On Nov 29, 2014, at 3:42 AM, "Zach Frankel" [REDACTED] wrote:

From what Susan tells me, I think that is unlikely. However, I do think there is a real chance we could be cast as an ethical alternative to big tobacco e-cigs.

For whatever its worth, NJoy is pursuing this strategy - on their homepage they say "Our mission is to obsolete combustible cigarettes completely. We are not owned by Big Tobacco and we never will be."

On Fri Nov 28 2014 at 3:28:29 PM Nicholas J. Pritzker <njpritzker@taocap.com> wrote:
Any chance it will be a balanced and objective article?

Sent from my iPhone

On Nov 28, 2014, at 11:58 AM, Zach Frankel [REDACTED] wrote:

I'm seeing Susan this evening. Will ask for her thoughts. As background this author won a Pulitzer for his distracted (texting) driving reporting and he is on his hunt for the next one,

On Fri, 28 Nov 2014 at 14:55 Nicholas J. Pritzker <njpritzker@taocap.com> wrote:

If he would consider holding off his article that could be interesting. Of course it might be a totally negative article but we can't control that and at least we could get some notoriety!

Sent from my iPhone

On Nov 28, 2014, at 11:42 AM, [REDACTED] wrote:

Just prior to launch (we do want to sell devices), and after JTI deal is complete.

We can be strategizing in the mean time and meet with Susan's friend.

Of course we'll also want Susan's thoughts. I'll let you know what she thinks.

- James

On Fri, Nov 28, 2014 at 2:38 PM, Nicholas J. Pritzker <njpritzker@taocap.com> wrote:

How soon would you be comfortable with that?

Sent from my iPhone

On Nov 28, 2014, at 11:33 AM, [REDACTED] wrote:

Susan and I spoke about that months ago. I'll work with her on it but we'll need to use JUUL as the vehicle.

- James

On Fri, Nov 28, 2014 at 9:47 AM, Riaz Valani <RValani@gacapital.com> wrote:

I mentioned to James that Susan MacTavish's friend Matt Richtel, Pulitzer Prize winning NYT journalist, is looking to write a long piece excoriating the e-cig industry. Would be great to be set apart from the pack as the responsible company in the vapor space; and in any case, not getting lumped in with the rest.

Sent from my iPhone

On Nov 28, 2014, at 8:09 PM, "Nicholas J. Pritzker" <njpritzker@taocap.com> wrote:

I could not agree more. We would welcome solid, objective clinical trials. I'd say we should help fund them, except that might cast doubt on the validity of the findings.

Sent from my iPad

On Nov 28, 2014, at 12:22 AM, Riaz Valani <RValani@gacapital.com> wrote:

I think being a standard setter on differentiated and validated product quality and safety (for all our products) relative to industry practice is a very very important thing to consider as to how we position the company. It would be great if we manage to sidestep any of this backlash and instead be perceived as the responsible vapor company.

Sent from my iPhone

On Nov 28, 2014, at 1:38 PM, "Gal Cohen" <gal@ploom.com> wrote:

Yes, crazy how alleged "public health professionals" are in some cases actually working against the improvement of public health

Farsalinas as always had a thoughtful rebuttal:

<http://www.ecigarette-research.com/web/index.php/2013-04-07-09-50-07/2014/188-fm-jp>

I will be spending 2 days with him in a week at the TSA conference, and hope to get him on our advisory board. He has already invited us to join a nascent e-cig society he is forming. Luckily in the US we have a decent chance of having the evidence-based science win the day.

All that said, over time consumers will increasingly become educated to seek out those companies like Ploom making quality products that they can trust.

Happy thanksgiving, everyone.

Gal

On Thu, Nov 27, 2014 at 5:17 PM, [REDACTED] wrote:
An amusing but horrifying view of what JT lobbying in Japan is capable of.

Thank you all for having a strong sense of ethics. This makes me sick.

- James

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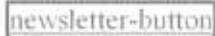
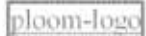
From: [REDACTED]
Date: Thu, Nov 27, 2014 at 5:46 PM
Subject: E-Cigarettes Contain '10 Times More Carcinogens Than Regular Tobacco'
To: "Monsees James" [REDACTED]

<http://www.ibtimes.co.uk/new-research-japan-claims-e-cigarettes-contain-10-times-amount-carcinogens-regular-tobacco-1476932>

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Gal Cohen | Head of Scientific and Regulatory Affairs

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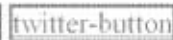
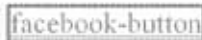
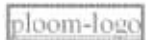


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